

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA)	CASE NO. 1:13CR345
)	
Plaintiff)	JUDGE CHRISTOPHER BOYKO
)	
-vs-)	
)	
DOMINIQUE BLAIR)	<u>DEFENDANT'S MOTION SEEKING</u>
)	<u>A PRE-PLEA PRE-SENTENCE</u>
Defendant))	<u>REPORT</u>

Now comes the Defendant, Dominique Blair, by and through attorney Brian R. McGraw, who respectfully moves this Honorable Court to authorize the preparation of a pre plea presentence report with respect to the criminal history only. Counsel is of the opinion that Ms. Blair MAY be eligible for "safety valve" consideration. It appears that Ms. Blair will have either 1 or 2 criminal history points (two misdemeanor convictions). Each of the convictions comes from the same incident. While there was only one incident, it generated cases in both Common Pleas Court and Cleveland Municipal Court, both of which resulted in misdemeanor convictions. Counsel believes that this determination, at this phase, will assist in a thoughtful resolution of the case.

Respectfully submitted,

s/Brian R. McGraw
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S E R V I C E

I hereby certify that on October 14, 2013, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail.

S/ Brian R. McGraw
BRIAN R. McGRAW (0036799)
Attorney for Defendant